location of Fayette County (of which Fayetteville is a part and county seat) is just south of the Urbanized area, but separate from it. Fayetteville does not receive any municipal services from the Atlanta area. It has been confirmed that Fayetteville has its own locally governing bodies and businesses. The distance from Fayetteville to Atlanta therefore was and remains not relevant to the proposed change of community of license from Griffin to Fayetteville.

Orchon notes that there would be a loss of service to areas presently receiving service from WQUL and WSKS once the proposed community changes are enacted. These service loss areas are purported to be located southeast of the respective WQUL and WSKS sites. Although based on the proposed allocation reference sites, these areas would not receive 1.0 mV/m service from the respective upgraded allotments, in keeping with the Commission's standard policy, the "Reference Sites" were each selected to place the proposed new channels as close as possible to the new communities. The sites were arbitrarily chosen to meet this goal. No consideration was given to the potential for "loss", since these were mere "references" and not preferred or formal sites. Channel 248C3 at Fayetteville, Georgia, and Channel 249C3 at Eatonton, Georgia, can be located at various transmitter sites which would allow the upgraded facilities to provide 1.0 mV/m service to the present Class A facilities (licensed) 1.0 mV/m contours. See Exhibits #1 and #2.

- 9. The hypothetical "loss" areas apparently were inproperly calculated, presuming six kilowatt operations by WQUL and WSKS, rather than their actual, existing, operational facilities. We have calculated the population within these "loss areas" to be 18,904 persons (in contrast to the 30,318 persons claimed by Orchon) in the WQUL present 1.0 mV/m contour and 3,490 persons in the present WSKS 1.0 mV/m contour. ² ³ ⁴ These theoretical loss figures, when compared to the new service which will result demonstrate that the proposed changes in communities of license is in the public interest.
- 10. WQUL operating on Channel 248C3 from the reference site would provide service to 867,736 persons. Of these persons, 104,036 persons presently receive WQUL, operating on Channel 249A. Therefore, a total of 763,700 persons would receive new service from WQUL. 5 WSKS operating as a new C3

²⁾ These were calculated using the presently licensed location of the WQUL and WSKS 1.0 mV/m contours. While applications are pending for each station to operate at six kilowatts effective radiated power (or equivalent), the application contours were not considered.

³⁾ The theoretical WQUL loss area presently receives service form WKEU, WHIE, WSTR, WZGC, WYAI, WSB, WSB-FM, WJGA-FM, WVFJ-FM and WAYS, among others.

⁴⁾ The theoretical WSKS loss area presently receives service from WLRR, WKZR, WHAN, WDEN-FM, WNEX-FM, WSNT, WSNT-FM and WPEZ, among others.

⁵⁾ The persons that will receive new service is based on the number of persons presently receiving WQUL, as a Class A, less the number of persons in the theoretical loss area, subtracted from the total persons within the WQUL 1.0 mV/m contour Class C3 contour.

facility at its proposed reference site would provide service to 83,989 persons within its 1.0 mV/m contour. Within this figure, 25,033 persons already receive service from WSKS, therefore, 58,956 persons would receive new service from WSKS.

- upgrades, 822,565 persons would receive <u>new</u> service from WQUL and WSKS. The hypothetical number of persons who would lose service, therefore, is less than 3% of the number of persons who will gain service. These gains figures, when added to the potential net gains which would be provided by the expanded service provided by the change Class A allotments at Ashland, Alabama and Hogansville and Thomaston, Georgia (as originally proposed by DMI & GMR), further outweigh the theoretical loss of service. A total of 848,693 persons would receive expanded service from the original DMI & GMR requests.
- 12. The total number of persons who would receive new service as a result of the DMI/GMR/Wood counterproposals at Fayetteville, Eatonton, Hogansville and Greenville, including the potential gains of population at Thomaston, Georgia, and Valley and Ashland, Alabama, would be 987,486 persons. This

⁶⁾ The persons that will receive new service is based on the number of persons presently receiving WSKS, as a Class A, less the number of persons in the theoretical loss area, subtracted from the total persons within the WSKS 1.0 mV/m Class C3 contour.

amount of gain, as compared to the theoretical service loss to 22,394 persons (WQUL and WSKS) would appear to be in the public interest.

- 13. As for the Service Index method of determining the proposed Greenville upgrade, DMI & GMR were not requested by the Commission to provide a service index analysis of its proposal. Further, in light of the resolution of the conflicts between the DMI & GMR proposal (Option 2) and Orchon's upgrade at Greenville (Option 1), this analysis is not necessary. All parties seeking upgraded facilities can be accommodated through the adoption of the DMI/GMR/Wood counterproposal without the denial of a single request.
- 14. The Perry comments raised several inconsistencies in the Commission's NPRM in this docket, specifically concerning what Channel to which WASZ was to be relocated and in which community WASZ was presently licensed. DMI & GMR initiated the proposal to relocate WASZ to Channel 238A (from Channel 237A). The original DMI & GMR Rule Making Petition was served on Perry, in which Channel 238A was specifically noted as the substitution channel for Ashland, Alabama.
- 15. Since Perry has found a potential upgrade availability for WASZ on Channel 238, if two additional

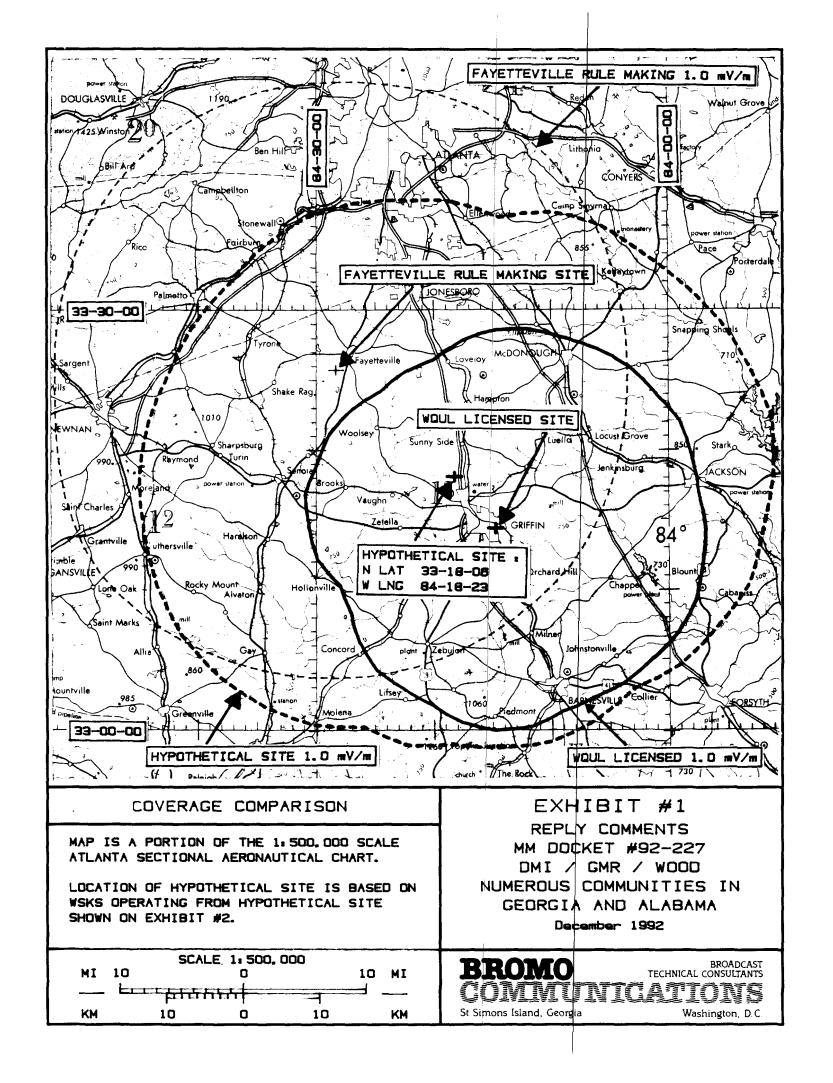
⁷⁾ The Orchon Service Index calculations for its proposed upgrade at Greenville failed to take into consideration the recently granted construction permit for Channel 223A at Zebulon, Georgia. This facility would impact the number of services available in several "pockets" and, therefore, change the calculated service index for that area, reducing its net population/services further.

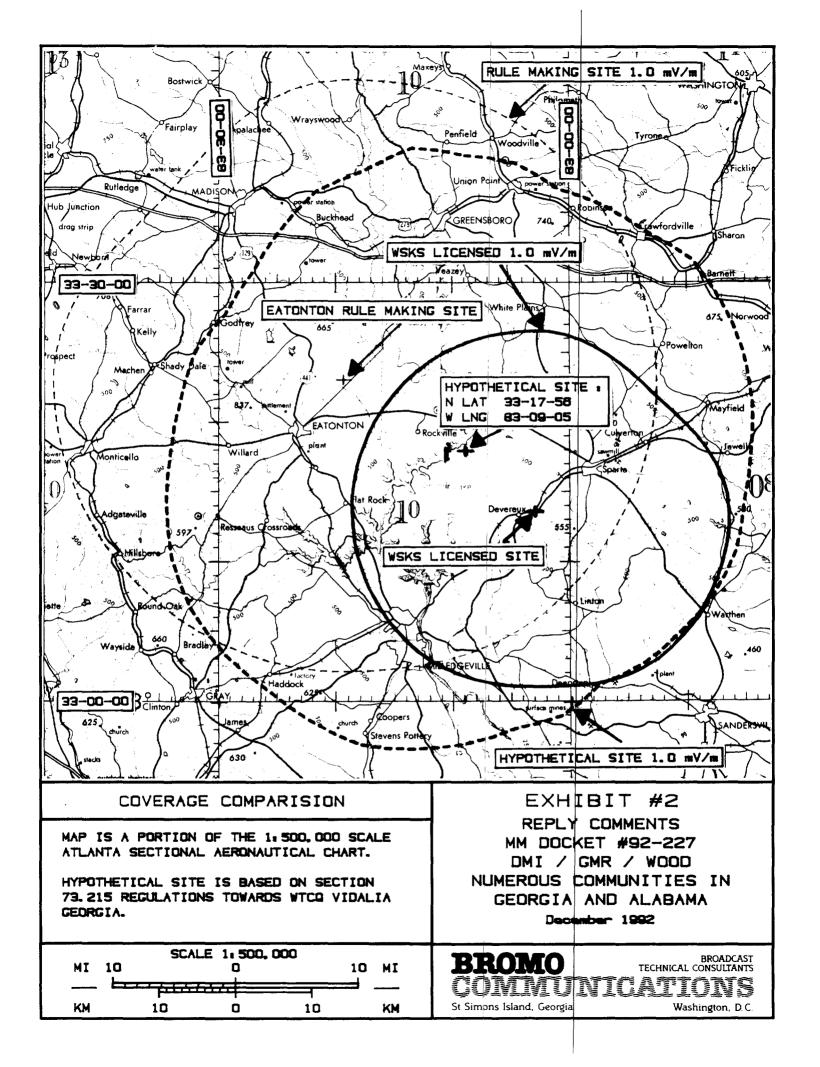
substitutions are made in other communities, the original DMI & GMR request, as modified by the Wood counterproposal should be activated, since it will not foreclose the potential upgrade at Ashland.

REQUEST

- 16. DMI/GMR/Wood support the proposal (Option 2) and counterproposal in MM Docket #92-227, since it will enable the upgrade of four facilities to Class C3 status and allow three Class A stations to improve to maximum six kilowatt stations. There no longer remains a meaningful conflict between the DMI/GMR/Wood and Orchon requests due to the availability of the alternate channel/upgrade potential available for Hogansville. Therefore, all parties seeking facilities upgrades in the proposal can be accommodated. Accordingly, DMI/GMR/Wood requests that the proposals outlined in its Comments be activated.
- 17. In the alternative, DMI/GMR/Wood request the adoption of the original DMI & GMR request, as outlined in the original petition, and the denial of the proposed Orchon upgrade request at Greenville, Georgia.
- 18. These technical comments were prepared on behalf of Design Media, Inc., Good Medicine Radio, GA, Inc., and T. Wood and Associates, Inc., by Bromo Communications, Inc.,

their Technical Consultants. All information contained herein in true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these reply comments, we welcome the opportunity to discuss the matter by phone at (912) 638-5608.





AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)	
St. Simons Island)	SS
County of Glynn)	

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Design Media, Inc., Good Medicine Radio, GA, Inc., and T. Wood and Associates, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 28th day of December, 1992.

son G. Brock

Sworn to and subscribed before me this the 28th day of December, 1992.

Notary Public, State of Georgia

My Commission Expires: September 8, 1995



VOLUME 1
CHARACTERISTICS OF THE POPULATION

CHAPTER A

Number of Inhabitants

PART 48

VIRGINIA

PC80-1-A48

Issued February 1982



U.S. Department of Commerce
Malcolm Baldrige, Secretary
Joseph R. Wright, Jr.,
Deputy Secretary
Robert G. Dederick,
Assistant Secretary for
Economic Affairs

BUREAU OF THE CENSUS

Bruce Chapman,

Director

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Table 13. Population of Urbanized Areas: 1980 and 1970

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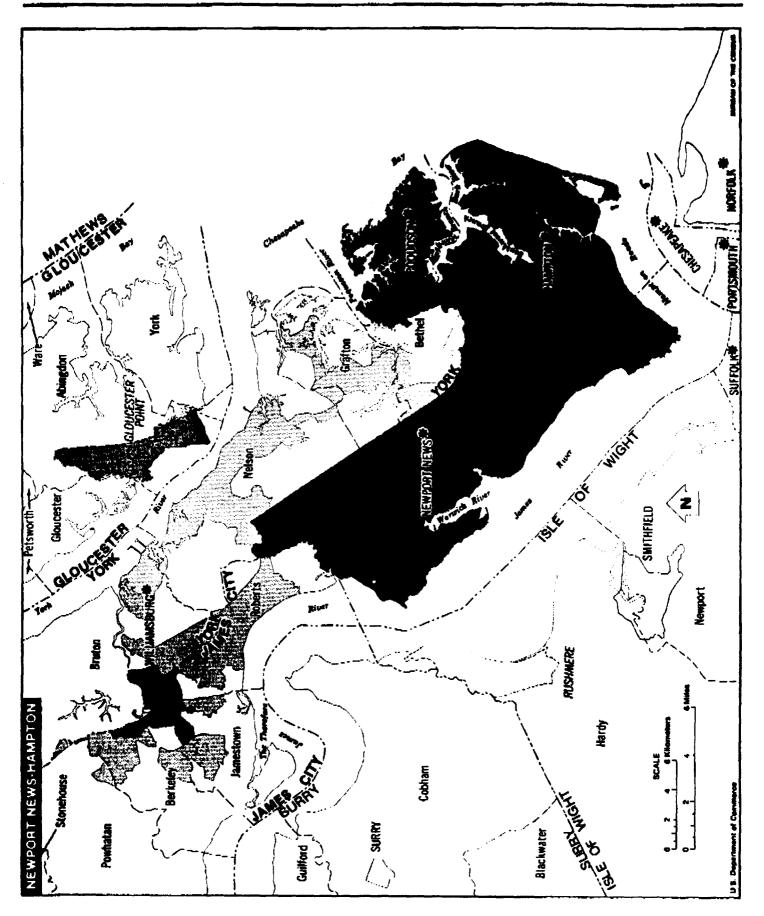
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VOLUME 1
CHARACTERISTICS OF THE POPULATION

CHAPTER A

Number of Inhabitants

PART 12

GEORGIA

PC80-1-A12

Issued January 1982



U.S. Department of Commerce
Malcolm Baidrige, Secretary
Joseph R. Wright, Jr.,
Deputy Secretary
Robert G. Dederick,
Assistant Secretary for
Economic Affairs
BUREAU OF THE CENSUS
Bruce Chapman,
Director

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Table 13. Population of Urbanized Areas: 1980 and 1970

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GEORGIA 12-4

NUMBER OF INHABITANTS

CITY OF FAYETTEVILLE

COUNTY SEAT OF FAYETTE COUNTY

P.O. BOX 302 FAYETTEVILLE, GA. 30214 (404) 461-6029 PROGRESS
IN
ACTION

December 18, 1992

Mr. Joe Beail Station Manager WQUL P.O. Box 997 Griffin, Georgia 30224

Dear Joe:

I am pleased to hear of your plans to move your station to the Fayetteville area. As you know, we are one of the largest communities in the State of Georgia without a radio station and your move here would clearly be in the public interest. Though Fayetteville and Fayette County are members of the Atlanta Regional Commission, we are a distinct community of our own, with County and Municipal governments serving the needs of over 70,000 people in the County. Through our membership in the ARC, we are able to participate in those issues affecting the region, while, at the same time, maintaining our own community identity and direction. For example, Fayetteville is the home of the oldest courthouse in the state. We are taking advantage of the historic nature of our downtown with a "Mainstreet program" designed to attract businesses into Fayetteville and to preserve our history. People are moving to Fayette County because of our unique lifestyle and quality of life; both of which we work hard to maintain.

With a hospital and a new library scheduled to be built soon, the number of community events and level of local news is increasing dramatically. A local radio station would provide great benefits to the public by delivering that local news and by participating in our many community events, such as, fundraisers, mainstreet festivals and so forth. The current level of support for these kinds of activities is low because we do not have a local station.

Joe, feel free to use this letter in your efforts to obtain the approvals you need to move yor station to Fayetteville. If there is anything else I can do to help, just let me know.

Very truly yours,

Mike Wheat, Mayor City of Fayetteville

cc: Council

Fred Scarborough





George Patton, Chairman Dan Lakly, Vice Chairman Bill Bonner Rick Price Steve Wallace Billy P. Beckett, Administrator W. R. McNally, Attorney

December 21, 1992

Mr. Leonard Bolton 124 N. McDonough Street Jonesboro, Georgia 30236

Dear Mr. Bolton:

It is my understanding that you have applied to the FCC for a license to operate an FM radio station in Fayette County at a site to be determined. It is also my understanding that you have no competitors for this license but that you do have a competitor from Greenville, Georgia for the desired frequency of 97.5.

I have been advised that there may be some question as to the need for a radio station in our community. Therefore, I would like to offer several comments, which in my opinion, justify the need for local radio service for our community. While we are clearly a part of the Atlanta market, there is little focus on our community from a community service perspective. We do receive limited coverage of local news, but seldom are most activities of real importance to Fayette County specifically covered. Further, I feel that we are particularly limited in times of local emergency. For example, several years ago we had a severe water crises that could have been abated if we had the means of rapidly disseminating information to our residents. By the time Atlanta stations learned of, and reacted to, our problem we had a full blown emergency. Similarly road reports and emergencies such as hazardous materials incidents are seldom covered by the Atlanta stations and even then, the report is issued well after the fact. As a result evacuations, emergencies and other similar situations are not handled as expeditiously as we need. Further, information on severe weather conditions, closings during inclement weather, and other important information is especially difficult to disseminate in a timely manner.

Finally, while I have mentioned that our community receives general news coverage, we typically do not receive news of local importance, including local community activities, sports, hard

Page 2 December 21, 1992 Mr. Lenonard Bolton

news, etc.

Therefore, I would like for you to know that it is my opinion that Fayette County would greatly benefit in a number of ways through the addition of a quality radio station that is oriented to our community and the special conditions related to Fayette County.

If I can provide additional information, please do not hesitate to contact me.

Sincerely

George /Patton

Chairman

GP/mw

Directory of

GEORGIA'S

Regional Development Centers

≫ 1991-1992 **≪**

Georgia Association of Regional Development Centers

